

REMARKS

Claims 1-13 are all the claims pending in the application. New dependent claims 11-13 have been added. Claims 1 and 3 are independent claims.

Claim Rejections Under 35 U.S.C. § 112

Claims 1-10 are rejected under 35 U.S.C. § 112, second paragraph, as being allegedly indefinite

Claims 1 and 3

With respect to independent claims 1 and 3, the Examiner has asked whether the features in the preamble are intended to be recited features of these claims. In response, Applicant has deleted many features from the preambles of claims 1 and 3 and has amended independent method claim 1 to recite some of the deleted features.

Moreover, the Examiner has asked whether the limitation “in an internal direction or an external direction with respect to the hard core” of claim 3 is narrowly limited to the axial direction or broader. In response, Applicant respectfully submits that the limitation is broader. That is, the movement into or out of the hard core does not have to be purely axial.

Claim 5

With respect to dependent claim 5, the Examiner states that it is not clear what is represented by the “engaging members, which are engageable with inner edge portions in a radial direction of the carcass, are provided at outer sides in an axial direction of the bladders.” In response, Applicant respectfully submits that this limitation is directed to members that are provide *radially outside* the bladder. For example, in the *non-limiting* embodiment shown in

FIG. 5 of the present specification, the engaging plate 32 engage with the inner edge of the carcass.

Claim 8

With respect to dependent claim 8, the Examiner states that there is no antecedent basis for the limitation “driving means.” In response, Applicant has amended claim 8 to recite that moving means comprises the driving means.

That is, the “driving means” of dependent claim 8 is an example of the broader “moving means” recited in independent claim 3. For example, in the *non-limiting* embodiment shown in FIGS. 11-13 of the present specification, a driving means moves the arms 54 in both axial (FIG. 12) and radial (FIG. 13) directions.

In view of these amendments, Applicant respectfully requests the Examiner to withdraw the §112 rejection.

Claim Rejections Under 35 U.S.C. § 102

Claims 1 and 3-6 are rejected under 35 U.S.C. § 102(b) as being anticipated by Haase (US 2,951,526). Claims 1 and 3-5 are rejected under 35 U.S.C. § 102(b) as being anticipated by Kawaida et al. (US 4,484,493). Claims 1, 3-6, and 8 are rejected under 35 U.S.C. § 102(b) as being anticipated by Ewing et al. (US 3,051,220). Claim 1 is rejected under 35 U.S.C. § 102(b) as being anticipated by FR 1,242,741 (“FR ‘741”).

Independent claim 1 has been amended to recite that the method includes providing a *sheet member* inside the carcass in a radial direction at both ends of the carcass. This

amendment is fully supported at least by the *exemplary* sheets 42, which are described in the original specification at the second paragraph of page 13 and shown in FIGS. 2-13.

With respect to independent claim 1, Applicant respectfully requests that the Examiner withdraw these §102 rejections at least because none of these applied references discloses the claimed method including a sheet member provided inside the carcass in a radial direction at both edges of the carcass. The provision of this sheet member allows both edges of the carcass to be turned up to predetermined locations.

Haase discloses a tire building machine including a drum 3, beads 8, an inflatable stitcher 38, and a flange 37.¹ However, there is no disclosure regarding the claimed sheet member.

Kawaida discloses a ply-turning device including a drum 11, bead cores 21, and an inflatable bladder 14.² Again, there is no disclosure regarding the claimed sheet member.

Ewing discloses a tire building machine including a drum D, beads B, and a bag assembly 24 with an inflatable air bag 76, and unlabeled portions that extend upward and are provided adjacent to the bag 76.³ There is no disclosure regarding the claimed sheet member.

FR '741 discloses an apparatus for folding tires including an unlabeled drum, bead cores 10, and an annular band 3.⁴ There is no disclosure regarding the claimed sheet member.

¹ See Haase at FIGS. 2-5.

² See Kawaida at FIGS. 3a & 3b.

³ See Ewing at, for example, FIGS. 13, 18-19.

Therefore, Applicant respectfully requests that the Examiner withdraw the §102 rejections of independent claim 1.

Independent claim 3 has been amended to recite that the apparatus includes an expanding/contracting means that is provided with a sheet member. This amendment is also fully supported at least by the *exemplary* sheets 42, which are described in the original specification at the second paragraph of page 13 and shown in FIGS. 2-13.

As discussed above, none of the references applied in the 102 rejections includes any structure that could reasonably correspond to the recited sheet member.

Therefore, Applicant respectfully requests that the Examiner withdraw the §102 rejections of independent claim 1.

Moreover, Applicant respectfully requests that the Examiner withdraw the §102 rejections of dependent claims 4-6 and 8 at least because of their dependency from claim 3.

Claim Rejections Under 35 U.S.C. § 103

Claims 1 and 2 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Caretta et al. (US 2002/0011297) or Oswald (US 4,830,781) in view of one of FR ‘741, Kawaida, or Haase.

Claims 7, 9, and 10 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Haase or Ewing, as applied to claims 3-6 and further in view of Brown et al. (US 4,199,393) or Niclas et al. (US 3,223,566).

⁴ See FR ‘741 at FIG. 2.

With respect to the combination of Caretta or Oswald in view of one of FR '741, Kawaida, or Haase, the Examiner asserts that Caretta and Oswald each disclose forming a tire carcass by sequentially providing cords side by side and in opposite directions and that each of these references discloses turning up inner portions of the carcass with beads.

However, these references do not make up for the deficiencies in FR '741, Kawaida, and Haase discussed above. That is, none of these references includes any structure that could reasonably correspond to the recited sheet member.

Therefore, Applicant respectfully requests that the Examiner withdraw the §103 rejection of independent claim 1.

Moreover, Applicant respectfully requests that the Examiner withdraw the §103 rejection of dependent claim 2 at least because of its dependency from claim 1.

Applicant respectfully requests the Examiner to withdraw the §103 rejection of dependent claims 7, 9, and 10 at least because of their dependency from claim 3 and because Browne⁵ and Niclas,⁶ which the Examiner looks as showing pressing of inflatable bladders, do not cure the deficiencies in Haase or Ewing discussed above.

⁵ See Brown at FIG. 4; 5:52-61.

⁶ See Niclas at FIG. 3.

New Claims

Finally, Applicant has added new claims 11-13 in order to provide additional claimed subject matter. Applicant respectfully submits that these claims are patentable at least because of their dependency from claim 1 or claim 3.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

/John M. Bird/

John M. Bird
Registration No. 46,027

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE

23373

CUSTOMER NUMBER

Date: March 12, 2007

Docket No. Q85280